

PHILLIP A. TALBERT  
United States Attorney  
JAMES R. CONOLLY  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

SARAH ANDERSON,  
FABIAN GOMEZ,  
EPIFANIO RAMIREZ,  
WENDY LABUDA,  
WILLIAM OWEN,  
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: August 21, 2023

TIME: 9:00 a.m.

COURT: Hon. William B. Shubb

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on August 21, 2023.
2. By this stipulation, defendants now move to continue the status conference until November 6, 2023 at 9:00 a.m., and to exclude time between August 21, 2023, and November 6, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports and photographs. The government has also made available to the

1 defense hours of video surveillance evidence for multiple controlled drug buys in the underlying  
2 investigation.

3 b) Counsel for defendants have met with their clients to discuss their respective  
4 cases. Defense counsel desire additional time to conduct investigation into the charges, the  
5 alleged roles of their respective clients, and to review discovery in this case, including watching  
6 the video evidence the government has made available. Defense counsel will need additional  
7 time to discuss potential resolutions with their clients, prepare pretrial motions, and otherwise  
8 prepare for trial.

9 c) Counsel for defendants believe that failure to grant the above-requested  
10 continuance would deny them the reasonable time necessary for effective preparation, taking into  
11 account the exercise of due diligence.

12 d) The government does not object to the continuance.

13 e) Based on the above-stated findings, the ends of justice served by continuing the  
14 case as requested outweigh the interest of the public and the defendant in a trial within the  
15 original date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of August 21, 2023 to November 6,  
18 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
19 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
20 of the Court's finding that the ends of justice served by taking such action outweigh the best  
21 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 15, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ JAMES R. CONOLLY  
JAMES R. CONOLLY  
Assistant United States Attorney

Dated: August 15, 2023

/s/ DANIEL B. OLMOS  
DANIEL B. OLMOS  
Counsel for Defendant  
SARAH ANDERSON,

Dated: August 15, 2023

/s/ DAVID D. FISCHER  
DAVID D. FISCHER  
Counsel for Defendant  
FABIAN GOMEZ

Dated: August 16, 2023

/s/ OLAF HEDBERG  
OLAF HEDBERG  
Counsel for Defendant  
EPIFANIO RAMIREZ

Dated: August 15, 2023

/s/ TASHA CHALFANT  
TASHA CHALFANT  
Counsel for Defendant  
WENDY LABUDA

Dated: August 16, 2023

/s/ JOHN R. MANNING  
JOHN R. MANNING  
Counsel for Defendant  
WILLIAM OWEN


Dated: August 16, 2023

/s/ TAMARA SOLOMON  
TAMARA SOLOMON  
Counsel for Defendant  
JOALEEN ROGERS

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: August 17, 2023

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE